

Deverie J. Christensen
Nevada State Bar No. 6596
Daniel I. Aquino
Nevada State Bar No. 12682
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Email: deverie.christensen@jacksonlewis.com
daniel.aquino@jacksonlewis.com

Attorneys for Defendant
SYB, LLC dba Golden Heart Senior Care

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KALIAH BURNETT,

Plaintiff,

vs.

GTLV LLC, dba GOLDEN HEART SENIOR
CARE, a domestic Limited-Liability
Company; DOES 1 through 20, inclusive;
ROE CORPORATIONS, 1 through 20,
inclusive,

Defendants.

Case No. 2:20-cv-00029-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT**

(Third Request)

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that Defendant SYB, LLC dba Golden Heart Senior Care, misnamed as GTLV LLC ("Defendant") shall have up to and including Tuesday, February 25, 2020, in which to answer or otherwise respond to Plaintiff Kaliah Burnett's Complaint. This stipulation is submitted and based upon the following:

1. This is the third request for an extension of time for Defendant to answer or otherwise respond to Plaintiff's Complaint.

2. That such an extension is necessary because the parties require further time to evaluate whether the claims raised in the pending Complaint may be resolved prior to the filing of Defendant's responsive pleading. Plaintiff conveyed a settlement offer to Defendant on February 10, 2020, which Defendant requires further time to evaluate.

3. This request is made in good faith and not for the purpose of delay.

Dated this 10th of February, 2020.

KANG & ASSOCIATES, PLLC

JACKSON LEWIS P.C.

/s/ Patrick W. Kang

Patrick W. Kang, Esq., Bar No. 10381
Kyle R. Tatum, Esq., Bar No. 13264
6480 W. Spring Mountain Road, Suite 1
Las Vegas, Nevada 89146

/s/ Daniel I. Aquino

Deverie J. Christensen, Bar No. 6596
Daniel I. Aquino, Bar No. 12682
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

Attorney for Plaintiff
Kaliah Burnett

Attorneys for Defendant
SYB, LLC dba Golden Heart Senior Care

ORDER

IT IS HEREBY ORDERED that the deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint is extended to and including Tuesday, February 25, 2020.

IT IS SO ORDERED

DATED: February 11, 2020



4828-2465-4772, v. 1

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE